

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Edna Leon Rosario : CHAPTER 13
: BANKRUPTCY NO. 15-17196 AMC
DEBTOR :
:

**DEBTOR'S OBJECTION TO THE
CERTIFICATION OF DEFAULT BY MIDFIRST BANK**

TO THE HONORABLE ASHELY M. CHAN, U.S. BANKRUPTCY JUDGE:

Movant/Debtor, **EDNA LEON ROSARIO**, by and through her attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by MidFirst Bank, Respondent/Creditor, and in support thereof, avers as follows:

1. On or about January 9, 2018, Movant/Creditor Chase Manhattan Mortgage, filed a Certification of Default with this Court alleging that Debtor was in arrears on their mortgage in the amount of \$426.62.
2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.
3. Upon information and belief, Debtor is current on her mortgage payments and/or some payments have not been properly credited.
4. No post-stipulation payment history has been attached by MidFirst Bank.

WHEREFORE, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor